

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
Nashville Division**

L.W., by and through her parents and next friends, Samantha Williams and Brian Williams, *et al.*,

*Plaintiffs,*

v.

JONATHAN SKRMETTI, in his official capacity as the Tennessee Attorney General and Reporter, *et al.*,

*Defendants.*

**Civil No. 3:23-cv-00376**

**MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Rule 83.01(b) of the Local Rules of this Court, Stella Yarbrough, a member of the bar of this Court, hereby moves for the admission *pro hac vice* of David Bethea, an attorney with the law firm of Akin Gump Strauss Hauer & Feld LLP, Robert S. Strauss Tower, 2001 K Street N.W., Washington, DC 20006, 202.887.4000, dbethea@akingump.com, for the purposes of this litigation in this Court as counsel for plaintiffs.

1. David Bethea does not reside in this district and does not maintain an office in this district for the practice of law.

2. David Bethea is a member in good standing of the United States District Court for the Southern District of New York. A certificate of good standing and sworn statement regarding disciplinary, contempt, and criminal proceedings are attached, and the filing fee

in the amount of \$150.00 has been paid to the Clerk via the Court's electronic payment system.

Dated: April 21, 2023

Respectfully submitted,

/s/ Stella Yarbrough

Stella Yarbrough, BPR No. 033637

ACLU Foundation of Tennessee

P.O. Box 120160

Nashville, TN 37212

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**DECLARATION OF DAVID BETHEA**

1. I hereby certify that I am a member in good standing of the bar of the United States District Court for the Southern District of New York. A true and correct copy of my Certificate of Good Standing is included with the motion for my admission *pro hac vice*.
2. I also declare under penalty of perjury that I am not, nor have I ever been, the subject of criminal proceedings nor disciplinary proceedings by any disciplinary authority, nor have I had a finding of contempt or a sanction against me under 28 U.S.C. § 1927.

/s/ David Bethea  
David Bethea

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Washington, DC 20006  
Telephone: (202) 887-4000  
Facsimile: (202) 887-4288  
Email: dbethea@akingump.com

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that on April 21, 2023, a true and correct copy of the foregoing has been served on all defendants via certified mail to the Tennessee Attorney General at the following address:

500 Dr MLK Jr Blvd  
Nashville, TN 37219

/s/ Stella Yarbrough  
Stella Yarbrough BPR No. 033637  
American Civil Liberties Union  
Foundation of Tennessee  
P.O. Box 120160  
Nashville, TN 37212  
Tel: (615) 320-7142  
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*Attorney for Plaintiffs*